

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA :  
 :  
v. :  
 :  
CHRISTINA EVANGELINE BARELA :

1:13CR 415 -1

The Grand Jury charges:

On or about November 20, 2008, in the County of Durham, in the Middle District of North Carolina, CHRISTINA EVANGELINE BARELA, in a manner within the jurisdiction of the executive branch of the government of the United States, that is, the Department of Veterans Affairs, did willfully and knowingly make and use a false writing or document knowing the same to contain a materially false, fictitious and fraudulent statement and entry, that is, a Department of Veterans Affairs Affidavit of Individual Surety Form 9000-0001, including the materially false and fraudulent representation that CHRISTINA EVANGELINE BARELA had pledged \$6,559,620.00 in assets represented by an Institutional Escrow Receipt issued by Lincoln Reserve Group, LLC, to support and secure a contract bond for SJ Construction, Inc., when in fact, as CHRISTINA EVANGELINE BARELA then well knew, she did not have \$6,559,620.00 in assets in escrow with Lincoln Reserve Group, LLC, and that the Institutional Escrow Receipt attached to the Affidavit of Surety was materially false; in

violation of Title 18, United States Code, Sections 1001(a)(3) and  
2.

A TRUE BILL:



A handwritten signature in ink, appearing to be 'F. Chut'.

FRANK J. CHUT, JR.  
ASSISTANT UNITED STATES ATTORNEY

A handwritten signature in ink, appearing to be 'R. Hamilton'.

ROBERT M. HAMILTON  
ASSISTANT UNITED STATES ATTORNEY

A handwritten signature in ink, appearing to be 'R. Rand'.

RIPLY RAND  
UNITED STATES ATTORNEY